



THE CITY OF NEW YORK
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December 22, 2023

BY ECF

Honorable Ona T. Wang
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Jose Rodriguez vs City of New York, et al.*, 23-CV-05531 (LAK) (OTW)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and a supervising attorney in the Special Federal Litigation Division. In that capacity, I write to respectfully request an extension of time, from December 29, 2023 to January 29, 2024, for the Defendant City to answer or otherwise respond to the Amended Complaint, which was filed on December 8, 2023. This is the first request for an extension of time to respond to the Amended Complaint and Plaintiff's counsel, Joel Wertheimer, consents to this request.

The reason for the City's request is that the City's defense of this case is currently being transferred from Gregory Musso to a different Assistant Corporation Counsel as Mr. Musso will be leaving employment at the Office of the Corporation Counsel shortly. Given the abrupt timing of Mr. Musso's departure, the need to transfer this case, next week's holidays and many attorneys' pre-scheduled vacations next week, a new attorney cannot be assigned to this matter until after January 1, 2024, which is after the deadline to respond to the complaint. As such, defendant City respectfully requests an additional 30-days, until January 29, 2024, to respond to the complaint so the newly assigned attorney can properly familiarize themselves with the case and prepare a responsive pleading.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Alexandra Corsi

Alexandra Corsi
Senior Counsel
Special Federal Litigation Division
New York City Law Department

cc: **By ECF**
All attorneys of record